

**Comments on texts resulting from the Terrestrial Animal Health Code Commission Report –
October 2006 Meeting
Submitted by the United States of America**

Appendix 3.7.2

Guidelines for the Transport of Animals by Sea

Specific comments

Article 3.7.2.2

Responsibilities

Current proposed text:

Item 2: Specific Considerations, (a) The responsibilities of the exporters include: (ii) ensuring the equipment and medication are provided as appropriate for the species and the journey;

Suggested proposed text:

Item 2: Specific considerations, (a) The responsibilities of the exporters include: (ii) ensuring the equipment and medication are provided as appropriate for the species and the journey, including a plan for administration of medication for common conditions to be expected during a journey if a veterinarian is not traveling with the vessel.

Comment/Rationale:

The United States suggest that ensuring that medication is provided for the species and the journey requires a plan to address common conditions that might be encountered during a journey if a veterinarian is not traveling with the vessel.

Suggested proposed text:

Item 2: Specific considerations, (k) The responsibilities of the *Competent Authority* of the importing country include: (vii) give animal consignments priority to allow import procedures to be completed without unnecessary delay.

Comment/Rationale:

We suggest the addition of new text to identify another responsibility for the *Competent Authority* of an importing country - Give priority to animal consignments transported by sea, which would allow the animals to be unloaded and continue to their final destination without unnecessary delay. The addition of this requirement would conform to the same responsibility for the *Competent Authority* included in the Guidelines for the Transport of Animals by Land.

Article 3.7.2.8

Travel

Current proposed text:

Item 2: Sick or injured animals, (b) -The last sentence as proposed states “All drugs and products should be used according to recommendations from a veterinarian and in accordance with the manufacturer’s instructions.”

Suggested proposed text:

Item 2: Sick or injured animals, (b) - We recommend the last sentence be changed to read “All drugs and products should be used in accordance with the manufacture’s instructions or veterinarian’s recommendations.”

Comment/Rationale:

The proposed guideline requires all drugs be used in accord with the manufacturer’s instructions. This requirement interferes with the professional judgment of a veterinarian for off- or extra-label use of drugs. As a result of the limited availability of veterinary pharmaceuticals, especially for minor species, off- or extra-label use of drugs may be necessary for appropriate treatment of animals.

Current proposed text:

Item 2: Sick or injured animals, (d) -When euthanasia is necessary, the veterinarian must ensure that it is carried out humanely. Recommendations for specific species are described in Appendix 3.7.6. on killing animals for disease control purposes.

Suggested proposed text:

Item 2: Sick or injured animals, (d) -When euthanasia is necessary, the ~~veterinarian~~ animal handler must ensure that it is carried out humanely. Recommendations for specific species are described in Appendix 3.7.6. on killing animals for disease control purposes. Veterinary advice regarding the appropriateness of a particular method of euthanasia should be sought as necessary.”

Comment/Rationale:

The proposed guideline requires that a veterinarian ensure that euthanasia, when necessary, is carried out humanely. If a veterinarian is not present, he or she cannot be expected to meet this requirement.